



Alan C. Lloyd, Ph.D.  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## Central Valley Region

Robert Schneider, Chair

Fresno Branch Office  
1685 E Street, Fresno, California 93706  
(559) 445-5116 • Fax (559) 445-5910  
<http://www.waterboards.ca.gov/centralvalley>



Arnold  
Schwarzenegger  
Governor

23 September 2005

Mr. Thaddeus Bettner  
Program Manager  
Westlands Discharge Coalition  
P.O. Box 6056  
Fresno, CA 93703

### **WESTLANDS DISCHARGE COALITION ANNUAL MONITORING REPORT, CONDITIONAL WAIVER OF WASTE DISCHARGE REQUIREMENTS FOR DISCHARGE FROM IRRIGATED LANDS RESOLUTION NO. R5-2003-0105 AND MONITORING AND REPORTING PROGRAM ORDER NO. R5-2003-0826**

Attached is a copy of our memorandum reviewing the subject Annual Monitoring Report (Annual Report) provided by the Westlands Discharge Coalition. After reviewing the subject report, we have concluded the following:

1. Future Annual Reports are to be completed and submitted by the prescribed deadline. The Coalition needs to provide the necessary resources to complete all work required by the Waiver and the MRP.
2. The Annual Report did not include an evaluation to determine patterns of pesticide/herbicide use in areas within the coalition, nor, was there any attempt to correlate the pesticide/herbicide data presented in the Annual Report with specific irrigated lands. This evaluation needs to be completed and provided to complete the subject report.
3. A detailed survey of the Coalition area needs to be performed to identify any possible locations where any irrigated drainage might be occurring.
4. The sampling trigger for stormwater sampling needs to be modified. The current protocol that triggers sampling events does not appear to be adequate. A new sampling trigger needs to be developed and proposed.
5. *Table 4* in the Annual Report indicates that there was stormwater flow in the Arroyo Pasajero stream at both sampling locations on the stream, and, some general analysis was performed. However, no laboratory sheets were provided for the minimal analysis performed. In addition,

the majority of constituents required to be analyzed were not included as part of the analytical efforts.

6. No sediment toxicity samples were collected in either sampling event. An alternate sampling site may need to be identified for future sediment sampling events.
7. Management Practice Effectiveness and Implementation Tracking information must be collected from Dischargers on the type of management practices that are being used, the degree to which they are being implemented within the watershed, and how effective they are in protecting waters of state. The Management Practice Effectiveness and Implementation Tracking information, as prescribed in the MRP, needs to be completed and submitted to complete the Annual Report.
8. The Pesticide Use Evaluation must include timing of pesticide applications, application rates, the amounts of pesticide applied, and the points of application. No Pesticide Use Evaluation was performed. A list of crops grown and a list of pesticides used during the winter storm months were included in the Annual Report, but there was no correlation made for pesticide/land use patterns. The Pesticide Use Evaluation needs to be provided to complete the subject Annual Report.

***Prior to 31 October 2005***, please provide us with a technical report that addresses the above items. Should you have any questions regarding this matter, please telephone Anthony Medrano at (559) 488-4395.

ORIGINAL SIGNED BY:

RUSSELL W. WALLS  
Senior Engineer  
RCE No. 43140

Enclosure

AM:am

cc: Mr. Tom Pinkos, Regional Water Quality Control Board, Rancho Cordova  
Mr. Bill Croyle, Regional Water Quality Control Board, Rancho Cordova  
Mr. Ken Landau, Regional Water Quality Control Board, Rancho Cordova  
Mr. Dennis Westcot, Regional Water Quality Control Board, Rancho Cordova